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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
CIVIL DIVISION

FRANCIS MOONEY III

PLAINTIFF

: civil action # _____

VS.

NEWTOWN TOWNSHIP POLICE DEPARTMENT

DEFENDANT

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:
:
:
JURY TRIAL
DEMANDED

COMPLAINT

Plaintiff, Francis Mooney III, is an adult individual resident of Pennsylvania, residing at 625 Swamp Road, Newtown, Bucks County, and currently incarcerated at Bucks County Department of Corrections at 1730 South Easton Road, Doylestown, PA 18901-2885.

Defendant Newtown Township Police Department is a Pennsylvania government agency with a principal place of business at 100 Municipal Drive, Newtown, Bucks County, Pennsylvania.

The jurisdiction of this court is invoked pursuant to 42 U.S.C. §1983, relating to actions for violations of civil rights.

On March 17, 2009, Plaintiff was assaulted by Officer Daniel Bartle, Officer Gregory Rugar, Officer Valerie Vogel, Detective Jason Harris, and Officer Paul Deppi, all acting together and on behalf of the Newtown Police Department. Plaintiff was struck in the head from behind several times with a club, and was further rendered incapacitated by several officers' Tasers, even after lying helpless in his hallway.

As a result of the beating, Plaintiff is suffering severe, potentially life-threatening and permanent head and brain injuries.

WHEREFORE, Plaintiff seeks money damages in excess of \$1 Million.

Respectfully Submitted,

Francis Mooney III

Francis Mooney, III

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Gina
6/24/10